

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**IN RE: LOCAL TV ADVERTISING  
ANTITRUST LITIGATION**

*This document applies to all actions.*

Master Docket No. 18-06785

MDL No. 2867

The Honorable Judge Virginia M. Kendall

**MOTION FOR LEAVE TO FILE UNDER SEAL PLAINTIFFS' MEMORANDUM OF  
LAW IN OPPOSITION TO DEFENDANTS SINCLAIR BROADCAST GROUP, INC'S  
AND GRIFFIN COMMUNICATIONS, LLC'S MOTION FOR PARTIAL JUDGMENT  
ON THE PLEADINGS**

Plaintiffs in the above captioned action, through their undersigned counsel, and pursuant to Local Rule 26.2 of the Local Rules of the United States District Court for the Northern District of Illinois, hereby move this Court for leave to file their Opposition to Defendants Sinclair Broadcast Group Inc.'s and Griffin Communications, LLC's Motion for Partial Judgment on the Pleadings ("Opposition") under seal. In support, Plaintiffs state as follows:

1. On March 16, 2022, Plaintiffs filed their Consolidated Third Amended Antitrust Class Action Complaint ("TAC"). ECF Nos. 555, 556.
2. In the TAC, Plaintiffs quote and reference certain documents produced by Defendants in this action that are designated as either "CONFIDENTIAL" or "CONFIDENTIAL – ATTORNEYS' EYES ONLY" pursuant to the Confidentiality Order entered by this Court (ECF No. 194, ¶ 3). The Court ordered certain paragraphs in the TAC sealed. *See* ECF Nos. 559, 587.
3. Plaintiffs' Opposition quotes and references certain paragraphs in the TAC that the Court ordered sealed.
4. A court may keep documents or portions thereof under seal "if there is good cause for sealing a part or the whole of the record." *Citizens First Nat. Bank of Princeton v. Cincinnati*

*Ins. Co.*, 178 F.3d 943, 945 (7th Cir. 1999). Here, the TAC contains confidential and highly sensitive information, including information that has been designated under the Confidentiality Order. The Court already has determined that there is good cause to maintain the redacted portions of the TAC under seal in this matter. *See* ECF Nos. 559, 587. The Opposition quotes and references certain redacted portions of the TAC. Accordingly, Plaintiffs respectfully request leave to file the Opposition under seal.

5. In compliance with Local Rule 26.2(c), Plaintiffs will file a public-record version of the Opposition that redacts quotes or references to Confidential material.

WHEREFORE, Plaintiffs request this Court grant them leave to file Plaintiffs' Opposition to Defendants Sinclair Broadcast Group Inc.'s and Griffin Communications, LLC's Motion for Partial Judgment on the Pleadings under seal.

Dated: July 26, 2022

Respectfully submitted,

/s/ Robert J. Wozniak  
**FREED KANNER LONDON &  
MILLEN LLC**  
Robert J. Wozniak  
Steven A. Kanner  
2201 Waukegan Road, Suite 130  
Bannockburn, IL 60015  
(224) 632-4500  
skanner@fklmlaw.com  
rwozniak@fklmlaw.com

*Plaintiffs' Liaison Counsel*

**HAUSFELD LLP**  
Megan E. Jones (admitted *pro hac vice*)  
600 Montgomery St. #3200  
San Francisco, CA 94111  
(415) 633-1908  
mjones@hausfeld.com

Hilary K. Scherrer (admitted *pro hac vice*)  
Nathaniel C. Giddings (admitted *pro hac vice*)  
888 16th Street, N.W.  
Suite 300  
Washington, DC 20006  
hscherrer@hausfeld.com  
ngiddings@hausfeld.com

*Plaintiffs' Lead Counsel*

**ROBINS KAPLAN LLP**  
Megan Hollywood (admitted *pro hac vice*)  
399 Park Avenue, Suite 3600  
New York, NY 10022  
(212) 980-740  
mhollywood@robinskaplan.com

*Plaintiffs' Steering Committee*

**FREED KANNER LONDON &  
MILLEN LLC**  
Kimberly A. Justice  
923 Fayette Street  
Conshohocken, PA 19428  
(610) 234-6487  
kjustice@fklmlaw.com

*Plaintiffs' Steering Committee*